



March 8, 2021

VIA ECF

Hon. Thomas J. McAvoy
Senior U.S. District Judge
Federal Building and U.S. Courthouse
15 Henry Street
Binghamton, NY 13901

Re: *United States v. Jacob Delaney*; 1:20-CR-335 (TJM)
Request to Seal Motion to Suppress and
All Supporting Materials

Dear Judge McAvoy:

We represent the Defendant, Jacob Delaney, in the above matter. On Friday, March 5, 2021 the Defendant filed his Reply brief in support of his motion to Suppress. Due to the Protective Order (ECF Doc. No. 38) in this matter, we redacted substantial portions of the Reply brief, filed a redacted version on ECF and submitted an unredacted version to the Court and Government. We request that the unredacted Reply brief be filed under seal as contains information covered by the above referenced Protective Order pursuant to Federal Rule of Criminal Procedure 49.1(e), Local Rule of Crime Procedure 49.2(b) and *Lugosch Co. v. Pyramid of Onondaga County*, 435 F.3d 110, 119-27.

Thank you for your attention to this matter.

Very truly yours,

O'CONNELL AND ARONOWITZ

By:

Scott W. Iseman, Esq.

cc: All parties (ECF)

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1925-1973
LEWIS A. ARONOWITZ
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The Court, having reviewed the contents of the Defendant's Memorandum of Law in Support of his Motion to Suppress, the Attorney Declaration of Scott W. Iseman, Esq. and the Exhibits attached thereto, which the Defendant's attorney submitted for *in camera* review, ORDERS that the entirety of these documents be sealed for the reasons stated above.

SO ORDERED.

Hon. Thomas J. McAvoy
Senior U.S. District Judge

Dated: _____